

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JAIME PINILLOS,
a/k/a "Jesus Medina,"
a/k/a "Segunda,"

Defendant.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:

APR 11 2007

INDICTMENT

07 Cr. ____

07 CRIM. 222

COUNT ONE

The Grand Jury charges:

1. From at least in or about 1991, up to and including in or about April 2007, in the Southern District of New York and elsewhere, JAIME PINILLOS, a/k/a "Jesus Medina," a/k/a "Segunda," the defendant, and others known and unknown, unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JAIME PINILLOS, a/k/a "Jesus Medina," a/k/a "Segunda," the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).

JUDGE PRESKA

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about April 1, 2006, in the Bronx, New York, a co-conspirator not named as a defendant herein ("CC-1") participated in a narcotics-related telephone call.

b. On or about March 30, 2006, in Brooklyn, New York, JAIME PINILLOS, a/k/a "Jesus Medina," a/k/a "Segunda," the defendant, received approximately 29 grams of cocaine from CC-1.

c. In or around April 2006, in Brooklyn, New York, JAIME PINILLOS, a/k/a "Jesus Medina," a/k/a "Segunda," the defendant, participated in a robbery in which approximately three kilograms of cocaine was stolen.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATIONS AS TO COUNT ONE

4. As a result of committing the controlled substance offense alleged in Count One of this Indictment, JAIME PINILLOS, a/k/a "Jesus Medina," a/k/a "Segunda," the defendant, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment, including

but not limited to proceeds obtained as a result of the offense described in Count One of this Indictment.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 846 and 853.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JAIME PINILLOS,
a/k/a "Jesus Medina,"
a/k/a "Segunda,"

Defendant.

INDICTMENT

07 Cr. ____

(Title 21, United States Code,
Section 846.)

FOREPERSON

MICHAEL J. GARCIA
United States Attorney.

Arnesand WPP

Post-It 11/1/87

*4/11/07- Fld. Indictment Case assigned
to Judge Preska for all purposes.*

*S. Eaton Jr. U.S. U.J.
H.L.*